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6 *Attorneys for Defendants Helicopter*
7 *Parts International, Inc., Harry*
8 *Niwranski, and Anthony Magnotta*

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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 ERICA BARROW, an individual
15 Plaintiff,

16 v.

17 HELICOPTER PARTS INTERNATIONAL,
INC., a Nevada Corporation; HARRY
18 NIWRANSKI, an individual; ANTHONY
MAGNOTTA; DOES I through X, Inclusive;
19 and ROE CORPORATIONS I through X,
inclusive,

20 Defendants.
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CASE NO.: 3:20-cv-00528-MMD-CLB

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
DEFENDANT TO FILE A REPLY IN
SUPPORT OF DEFENDANTS' SPECIAL
MOTION TO DISMISS FIRST AMENDED
COMPLAINT PURSUANT TO NRS 41.660**

(First Request)

22 Plaintiff Erica Barrow ("Barrow") and Defendants Helicopter Parts International, Inc.
23 ("HPI"), Harry Niwranski ("Niwranski"), and Anthony Magnotta ("Magnotta") (collectively, when
24 possible, "Defendants"), by and through their respective counsel, hereby submit the following
25 Stipulation and [Proposed] Order to Extend Deadline for Defendant to file a Reply in Support of
26 Defendants' Special Motion to Dismiss First Amended Complaint Pursuant to NRS 41.660.
27 Defendants seek a two-week extension to file their Reply. This request is made in good faith to
28 accommodate the schedule of defense counsel and the holiday season, and is not made for the purpose

1 of delay, and will not result in any undue delay or prejudice. Accordingly, the Parties have agreed and
2 stipulate that the deadline for the Defendants to file their Reply in Support of Defendants' Special
3 Motion to Dismiss First Amended Complaint Pursuant to NRS 41.660 will be on or before January
4 13, 2021.

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6 DATED this 30th day of December, 2020.

DATED this 30th day of December, 2020.

7 BY: /s/ Matthew C. Piccolo
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11 *Attorneys for Plaintiff*

12 *Attorneys for Defendants*

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14 **IT IS SO ORDERED:**

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16 Dated: January 4, 2021.

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19 UNITED STATES DISTRICT JUDGE
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